

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,

VS.

Case No. 11-107

IVAN BOSTON,

Defendant.

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The Defendant, by and through his counsel, requests, pursuant to Rule 24(a) of the Federal Rules of Criminal Procedure, that the Court include the following questions in its general voir dire of the jurors in order that the defense may effectively exercise its challenges for cause and peremptory challenges.

1. Do you have an opinion about gun control laws?
2. If yes, what is your opinion?
3. Does this feeling or opinion prevent you from being a fair and impartial juror in a case where the charge is gun possession?
4. Have you ever owned a handgun or rifle?
5. If yes, what kind?
6. Have you ever fired a handgun or rifle?
7. Have you heard or read anything recently about gun violence?
8. Does anything that you may have read or heard prevent you from being fair and impartial in a case where the charge is possession of a handgun?

9. Have you or a member of your family or a close friend or relative been the victim of a crime involving guns?
10. If you learned that the defendant had a felony conviction, would that fact alone make it difficult for you to be fair and impartial?
11. Do you have any strong feelings or opinions about people who drive a car after consuming alcohol that would prevent you from being a fair and impartial juror?
12. Have you or a member of your family or a close friend or relative been involved in a car accident with someone who alleged to have been intoxicated?
13. If yes, does that incident prevent you from being a fair and impartial juror in this case?
14. As I have already instructed you, the defendant in this case is presumed to be innocent and the burden of proof is on the government. If you heard that the allegations are that the defendant was intoxicated, in possession of a handgun and behind the wheel of a car, interfere with your ability to presume that the defendant is innocent, as the law requires? In other words, can you follow the law as it is given to you by the court, or will these allegations prevent you from doing so?
15. Do you agree that sometimes innocent people are wrongly accused of a crime?
16. Do you agree that even a person who *may* be guilty should be found not-guilty if the government is unable to prove their guilt beyond a reasonable doubt?
17. Have you ever served in the military?
18. What branch?
19. Years of Service?
20. Highest Grade or Rank Attained?

21. What were your duties?
22. Did you serve in combat?
23. What type of discharge did you receive?
24. Did you ever serve in the military police?
25. Do you consider yourself to be politically conservative, moderate or liberal?
26. Have you ever sought or held a political office?
27. Are you or your spouse a member of (or have you ever been a member of) any neighborhood, local, state or nationwide crime prevention watch organization?
28. Name three (3) people you admire the most?
29. Name three (3) people you admire the least?
30. Do you or your spouse know or have any friends who are attorneys?
31. What is your impression of prosecutors in general?
32. What is your impression of criminal defense attorneys in general?
33. Have you, your spouse, a relative or close friend, presently or in the past, been a member or employee of a law enforcement agency or organization?